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7 LOANSTREAM MORTGAGE

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**UNITED STATES DISTRICT COURT**

10 CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

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12 KIMBERLY HUDSON-BRYANT,  
13 individually and on behalf of all others  
similarly situated,

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## Plaintiffs,

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V.

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17 OCMBC, INC. d/b/a LOANSTREAM,  
18 PREMIER FINANCIAL MARKETING  
LLC D/B/A RESMO LENDING, AND  
SEAN ROBERTS

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### Defendants.

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Case No. 8:24-cv-00067-FWS-JDE

**DECLARATION OF THOMAS F.  
LANDERS IN SUPPORT OF JOINT  
MOTION AND STIPULATION TO  
CONTINUE CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: TBD

1 I, Thomas F. Landers, declare:

2 1. I am an attorney at law licensed to practice before all federal and state  
3 courts in the State of California and am a partner with Solomon Ward Seidenwurm &  
4 Smith, LLP (“SWSS”), counsel for Defendant OCMBC, INC. dba LOANSTREAM  
5 MORTGAGE (“LoanStream”) in this action. I have personal knowledge of the facts  
6 set forth in this declaration and I submit this declaration in support of the Parties’ Joint  
7 Motion and Stipulation to Continue Case Deadlines (“Stipulation”).

8 2. Plaintiff filed a class action complaint on or about January 1, 2024.

9 3. After conducting certain discovery, on September 10, 2024, Plaintiff  
10 filed a first amended complaint (“FAC”) and named two additional defendants. (ECF  
11 No. 37).

12 4. Shortly thereafter, the Parties requested an extension of all case deadlines  
13 to properly investigate and address the new allegations in the FAC and to allow the  
14 new parties to participate in the case. (ECF No. 40).

15 5. On October 24, 2024, the Court issued a revised scheduling order that  
16 imposed the deadlines currently at issue in this Stipulation (“Scheduling Order”).  
17 (ECF No. 48).

18 6. On April 28, 2025, the Court issued its Order re Joint Motion and  
19 Stipulation to Continue Case Deadlines (“Revised Scheduling Order”), which among  
20 other things, continued the non-expert discovery cut-off to July 11, 2025, and reset  
21 related litigation dates (ECF No. 50). The primary reason the Parties requested the  
22 Revised Scheduling Order was because a key witness in the case had been involved  
23 in a traffic accident that resulted in the witness’ unavailability. That issue still exists,  
24 and a recent issue with the Plaintiff’s availability has arisen.

25 7. Since the Court issued the Revised Scheduling Order, the Parties have  
26 continued to engage in substantial written and oral discovery, but those efforts are not  
27 yet complete. A key witness, who is both a percipient and 30(b)(6) witness for  
28 LoanStream was involved in a traffic incident that resulted in the witness being

1 unavailable to testify in this case to date. This witness's testimony is important to both  
2 the Plaintiff's and Defendants' cases, and may result in additional needed discovery.  
3 Further, and as detailed in the accompanying declaration of Plaintiff's counsel,  
4 Andrew R. Perrong, Plaintiff's husband is scheduled for surgery, and Plaintiff needs  
5 to be available to care for him. This will delay Plaintiff's availability to provide  
6 deposition testimony and otherwise participate in the case.

7       8. For the reasons set forth herein, and to conserve time and judicial  
8 resources, the Parties believe that a 90-day extension of all deadlines will allow the  
9 Parties to properly complete discovery and prepare for trial.

10 I declare under penalty of perjury under the laws of the State of California that  
11 the foregoing is true and correct, and that this declaration was executed on June 20,  
12 2025, at San Diego, California.

/s/ Thomas F. Landers  
Thomas F. Landers, Esq.